

December 5, 1980

Regional Administrator
Region X
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Attention: Mr. Michael Johnston

Subject: REQUEST TO EXCHANGE AIR EMISSION SOURCES IN THE PRUDHOE BAY
OIL FIELD

Dear Sirs:

On October 23, 1980 representatives of the Prudhoe Bay Unit Owners met in Seattle with your staff to discuss an emissions exchange proposal to allow the construction of recently identified Waterflood and Produced Water Injection (PWI) facilities not covered under the original PSD applications. SOHIO Alaska Petroleum Company and ARCO Oil and Gas Company, on behalf of the Prudhoe Bay Unit Owners, hereby request that an emissions exchange, as outlined in the attached technical document, be considered for approval.

The important points highlighted in this technical document, entitled "Air Quality Impacts in the Prudhoe Bay Oil Field Resulting from an Exchange of Emissions Sources" prepared by Radian Corporation are as follows:

1. To counteract the increase in emissions and air quality impacts from equipment associated with the recently identified Waterflood and PWI facilities, the Unit Owners propose that certain pieces of equipment included under USEPA permit No. PSD-X79-05 (PSD I) not be installed.
2. There will be a net decrease in air pollutant emissions as a result of the proposed exchange of emission sources.
3. For the worst case scenario examined in the emissions exchange proposal, atmospheric dispersion modeling results indicate that the maximum predicted NO_x concentrations are not significantly greater (less than $1.0 \mu\text{g}/\text{m}^3$) than the maximum concentrations predicted in the latest Waterflood PSD application revision dated January 14, 1980. NO_x is the pollutant of most concern.

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4. Best Available Control Technology (BACT) as identified in USEPA permit No. PSD-X80-09 will be applied to the gas fired turbines and heaters proposed in the emission exchange.

Financial commitment for facilities outlined in the exchange proposal will occur during the first quarter, 1981. To meet these commitments and maintain the current project schedules will require an approval of our request by February 1, 1981. If you so desire, we would be pleased to discuss this request in further detail at your convenience.

Very truly yours,



G.N. Nelson
SOHIO Alaska Petroleum Company



P.B. Norgaard
ARCO Oil and Gas Company

/bjs

Attachments

cc: Mr. Tom Hanna, ADEC
Mr. Doug Lowery, ADEC
Mr. Jim Sweeney, EPA